

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NICOLE TOUSSAINT and VERONICA
ROMAN, individually and on behalf of all
other similarly situated,

Plaintiffs,

v.

HANESBRANDS, INC.,

Defendant.

Case No. 1:22-cv-00879-LCB-LPA

CLASS ACTION

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL AND TO
DIRECT NOTICE OF PROPOSED SETTLEMENT TO THE CLASS**

Plaintiffs move for entry of an order directing notice of the proposed class action settlement and scheduling a hearing to consider final approval of the settlement. Plaintiffs are simultaneously filing a supporting Memorandum of Law and the Declaration of Gary E. Mason, which includes, at Exhibit 1, the Settlement Agreement and all referenced exhibits. For the reasons set forth in that Memorandum, Plaintiffs respectfully request that the Court enter the Proposed Preliminary Approval Order as Exhibit 1-D to the Settlement Agreement. For ease of reference, the capitalized terms in this Motion and the accompanying Memorandum have the meaning set forth in the Settlement Agreement.

Dated: April 2, 2024

Respectfully Submitted,

/s/ Gary E. Mason

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Rule 83.1(d) Counsel for Plaintiffs

** pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Gary E. Mason

Gary E. Mason

MASON LLP